

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA, *ex rel.*
ALEX DOE, Relator, THE STATE OF
TEXAS, *ex rel.* ALEX DOE, Relator, THE
STATE OF LOUISIANA, *ex rel.* ALEX DOE,
Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD FEDERATION
OF AMERICA, INC., PLANNED
PARENTHOOD GULF COAST, INC.,
PLANNED PARENTHOOD OF GREATER
TEXAS, INC., PLANNED PARENTHOOD
SOUTH TEXAS, INC., PLANNED
PARENTHOOD CAMERON COUNTY,
INC., PLANNED PARENTHOOD SAN
ANTONIO, INC.,

Defendants.

No. 2:21-cv-022-Z

Date: June 20, 2023

EXHIBIT A

Uncited Documents in Plaintiffs' Supplemental Appendix¹

Supplemental Appendix Pages	Supplemental Appendix Document Title²
Appx.006313 – 6314	Email re Disclosing Medicare Self-Identified Overpayments; dated December 12, 2017
Appx.006315 – 6316	Email re How can you better protect your organization from FCA risks?; dated January 4, 2022
Appx.006317 – 6318	Email re Federal Court Finds that CMS Overpayment Rule Does Not Violate Medicare Requirements; dated August 26, 2021
Appx.006319 – 6321	Email re False Claims in Healthcare – Your Essential FCA Guidebook; dated August 31, 2021
Appx.006407 – 6408	Email re Medicare Self Disclosure Request; dated January 24, 2020
Appx.006409 – 6412	Email re Important DOJ and OCR Updates; dated February 7, 2019
Appx.006419 – 6425	Email re April 2017 Compliance Updates; dated April 3, 2017
Appx.006426 – 6428	Email re First 60-day repayment rule settlement announced; dated August 31, 2016
Appx.006429	Email re Important – Federal Audit Report of PPNT; dated March 7, 2016
Appx.006430	Email re Medicaid Payment Update; dated December 7, 2015
Appx.006431 – 6436	Email re PPGT Debt Repayment Plan; dated October 6, 2016
Appx.006439 - 6440	Email re OIG footnote; dated April 10, 2015

¹ Among these 63 uncited documents are 18 documents that no Defendant designated Confidential or Attorneys' Eyes Only. While such documents should never have been filed in the first place and are thus not properly "judicial records," *see* Loc. R. 5.2, Plaintiffs need never have sealed them in the first instance.

² To avoid confusion, Defendants have—where possible, given Plaintiffs' condensing of multiple documents from the Supplemental Appendix into a single entry in the Index—used the document titles as written in Plaintiffs' Index (ECF No. 416). However, Defendants' use of these titles does not constitute any agreement or concession that Plaintiffs' descriptions are accurate. Indeed, many of them are not.

Supplemental Appendix Pages	Supplemental Appendix Document Title²
Appx.006441 – 6443	Email re Internal update on TX audit media strategy; dated October 25, 2012
Appx.006444 – 6446	Email re HHS OIG Report on Texas Medicaid & PP North Texas; dated March 30, 2015
Appx.006500 – 6502	Email re Talking Points for the Board; dated April 6, 2016
Appx.006503	Email re Medicaid Termination; dated December 2, 2015
Appx.006505	Email re Melanie; dated December 21, 2016
Appx.006506 – 6507	Email re meeting in Dallas; dated March 22, 2016
Appx.006508 – 6511	Memo re Gap Funding Approach – Medicaid Funding “Limbo Period”; dated June 16, 2017
Appx.006512 – 6601	Office of the Inspector General Work Plan 2015
Appx.006602 – 6603	Email re Friday’s SAP/PPGC Meeting; dated March 1, 2017
Appx.006604 – 6634	PPFA Medicaid Reimbursement Toolkit
Appx.006635 – 6636	Email re HCIP Assistance; dated October 12, 2016
Appx.006637	Email re How was the call with Jon and Melaney?; dated June 7, 2017
Appx.006638 – 6642	Email re Wendy Davis National Media Tonight; dated October 20, 2015
Appx.006643 – 6652	PPFA Ancillary Organization Self-Study Review
Appx.006653 – 6661	PPFA HCIP Year 4 Report: Core Competencies
Appx.006662 – 6664	Email re Minutes from August 2019 Fiduciary Committee Meeting; dated October 15, 2019
Appx.006665 – 6671	Email re Medicaid/Medicare/CHIP payments for FY 2016 through 2018; dated April 9, 2020
Appx.006672 – 6691	Email re agenda and background materials for 2/6 & 2/7 mtgs; dated February 4, 2013
Appx.006692 – 6711	Email re DHHS OIG Release of New Guidance for Health Care Boards; dated April 21, 2015

Supplemental Appendix Pages	Supplemental Appendix Document Title²
Appx.006712 – 6713	Notes: Rulemaking and Comments Workgroup Call 7/26/16
Appx.006714 – 6759	Memo re Office of the Inspector General (OIG) Guidance on Avoiding Medicare and Medicaid Fraud and Abuse
Appx.006760 – 6763	Email re Update from Foundational Group; dated May 4, 2018
Appx.006764 – 6765	Email re Thank you for joining “How Does This Get Paid: An Introduction to PPFA’s Medicaid Reimbursement Toolkit”; dated October 28, 2019
Appx.006766 – 6768	Email re Nah nah nah nah; dated December 12, 2020
Appx.006769 – 6777	Email re Ruth Green Award; dated February 14, 2017
Appx.006778 – 6790	PPFA Delegeuide, PPFA Annual Membership Meeting; dated April 27, 2018
Appx.006791 – 6812	Email re FAA Turnaround Plan; dated August 11, 2016
Appx.006813 – 6848	Taking C.A.R.E. of Business, Introduction of the PPFA Compliance Initiative
Appx.006849 – 6867	PPFA Revenue Cycle Toolkit
Appx.006868 – 6871	Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016
Appx.006872 – 6873	Email re REMINDER: SAVE THE DATE: Medicaid Auditing and Compliance Webinar; dated June 16, 2011
Appx.006874 – 6877	Email re Upcoming Webinar on New Managed Care Rule; dated May 25, 2016
Appx.006878 – 6881	Email re 5th Circuit Ruling re: Planned Parenthood in Medicaid; dated November 23, 2020
Appx.006882 – 6884	Email re Medicaid Issues in the Media; dated October 19, 2015
Appx.006885 – 6892	Email re Very interesting from PPFA; dated February 5, 2014
Appx.006893 – 6964	PPFA National Office Quarterly Update for ACEC

Supplemental Appendix Pages	Supplemental Appendix Document Title²
Appx.006965 – 6973	PPFA National Program Support
Appx.006974 – 6986	Email re President Biden Takes Action on Sexual and Reproductive Health; dated January 29, 2021
Appx.006987 – 6992	Email re Restricted PPOL email for Texas; dated September 11, 2021
Appx.006993 – 7024	ARMS Insurance Agreement
Appx.007025 – 7038	Email re Communicating About SBA Loans or Other Federal Resources; dated May 20, 2020
Appx.007039 – 7041	Email re Gap Funding Approach & Additional Contingency Planning Details; dated June 29, 2017
Appx.007042 – 7062	Email re GPO Agreement Renewal; dated December 17, 2013
Appx.007063 – 7087	Email re 2021 National Conference Program Book; dated April 12, 2021
Appx.007088 – 7140	ARMS Risk Management Forms
Appx.007141 – 7155	ARMS Risk Management Integrated Enterprise-Wide Risk Management Program
Appx.007156 – 7165	Email re Medicaid Case Dismissed TODAY; dated May 13, 2021
Appx.007166 – 7167	Email re following up – contract scope, material from the archives re: Lozier report; dated January 27, 2017
Appx.007168 – 7310	Power & Purpose: 100+ Years Strong, P's In a Pod: Developing an Internal Culture that Supports Strategic Initiatives
Appx.007311 – 7314	Email re Support and continued access for your Texan Medicaid patients; dated January 25, 2021
Appx.007315 – 7328	Policyholders' Trust IRS 990

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2023, a copy of the foregoing was served pursuant to the Court's ECF system.

/s/ Danny S. Ashby
Danny S. Ashby